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**SOUTHWEST GAS CORPORATION**

November 16, 1999

DOT Dockets Unit, Plaza 401  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, DC 20590-000 1

RE: Pipeline Safety: Enhanced Safety and Environmental Protection for Gas  
Transmission and Hazardous Liquid Pipelines in High Consequence Areas  
Docket No. RSPA-99-6355 - 3

Dear Sir/Madam:

Southwest Gas Corporation (Southwest) is a natural gas local distribution company serving over 1.2 million customers in Arizona, California and Nevada and operates approximately 1,422 miles of transmission and 6,352 miles of distribution pipelines.

Southwest understands that the contemplated changes to 49 CFR Part 192 and Part 195 are the result of a Congressional mandate to increase pipeline safety in areas of high population and areas that are unusually sensitive to environmental damage. Southwest believes that prior to pursuing further regulation, a review should be completed to determine the extent to which operators currently employ integrity management programs. The review may confirm that most operators have adequate policies and procedures currently in place and that no regulatory changes are warranted. This type of "best practice" approach has already proven itself partially effective with the creation of the Damage Prevention Quality Action Team. The need, if any, for increased inspection, enhanced damage prevention, improved emergency response and other measures to prevent and minimize pipeline leaks and ruptures could also be identified in this forum.

The key elements and the approach described in the Federal Register Notice by the Office of Pipeline Safety summarizes the steps considered by most operators that implement additional requirements on pipelines in "high consequence" areas. This approach is often referred to as risk management. The advertisement of and sharing of the risk management processes through "best practices" would promote the development and implementation by all operators.

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As such, Southwest suggests that the following considerations be taken into account to determine if additional safety and environmental regulations are needed and/or warranted.

- Much of the authorities to govern and regulate pipelines in “high consequence” areas already exist in 49 CFR Parts 192 and 195. Using or revising existing regulations to include performance language to cover this issue may simplify the process.
- Any new or revised regulatory requirements that are developed should be written with performance based language rather than prescriptive. This would allow operators to implement a program that works best for their unique situation, rather than being restricted to specific actions and tools, such as, smart pigs and remote control valves. This would also minimize the difficulty of establishing consistency among all of the regions and individual state pipeline safety programs.
- It could be very difficult to finalize new regulation for this issue by trying to achieve consensus among Local Distribution, Transmission and Hazardous Liquid pipeline companies due to their distinct operational differences. These differences further promote the concept of using performance-based language if changes to the current regulations are determined to be warranted.

The use of prescriptive, or restrictive, code language would result in higher implementation costs. The use of performance based regulations allow operators to develop and implement an integrity plan that best meets the needs of their facilities in the most cost effective manner. The benefits of this flexibility would be directly proportionate to the cost impact on all operators, large or small.

Southwest appreciates this opportunity to submit comments on this issue. If you have any questions or would like to discuss this subject further, please contact me at (702) 364-3167.



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Sincerely,

John Clayton  
Supervisor/Staff Compliance

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